

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

PAUL D. CEGLIA,

Civil Action No. : 1:10-cv-00569-RJA

Plaintiff,

AFFIDAVIT

v.

MARK ELLIOT ZUCKERBERG, Individually, and
FACEBOOK, INC.

Defendants.

STATE OF OHIO

COUNTY OF CUYAHOGA

ss:

DEAN BOLAND, being duly sworn says:

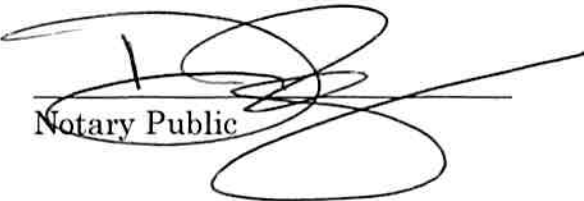
1. I am counsel for Paul D. Ceglia in this matter.
2. I submit this affidavit in support of Mr. Ceglia's claim of privilege regarding two documents currently under in camera review by this court.
3. At the court's direction, I submitted to the court a file titled Lawsuit_Overview.pdf for in camera review pursuant to a claim of privilege protecting the file from disclosure to defendants.
4. After a brief conversation with Mr. Ceglia following submission of that document to the court, it was clarified that pages twenty-three to thirty (23-30)

of that file also contain information that Mr. Ceglia is asserting is protected by attorney-client privilege for the same reasons applicable to the other portions of that document (pages one through six) that were previously claimed privileged as outlined in Mr. Ceglia's memorandum submitted to the court early this morning.

5. Therefore, Mr. Ceglia's claim of privilege as to that document comprises pages one through six (1-6) and pages twenty-three through thirty (23-30).
6. The remainder of that document has already been disclosed to the Defendants today.


Dean Boland

Sworn to before me this 26th day of October, 2011.


Notary Public

DAVID JUNG
Notary Public, State of Ohio
My Commission Exp. Oct. 8, 2013

